



FEDERAL ELECTION COMMISSION  
WASHINGTON, D.C. 20463

RQ-2

June 3, 2005

Michael L. Retzer, Treasurer  
Republican National Committee  
310 First Street SE  
Washington, DC 20003

**Response Due Date:**  
**July 5, 2005**

Identification Number: C00003418

Reference: Amended Year End Report (11/23/04-12/31/04), received 5/3/05

Dear Mr. Retzer:

This letter is prompted by the Commission's preliminary review of the report(s) referenced above. This notice requests information essential to full public disclosure of your federal election campaign finances. **An adequate response must be received at the Commission by the response date noted above.** An itemization of the information needed follows:

-Schedule A of your report discloses aggregate year-to-date totals for contributions received from individuals which appear to be incorrect. Please be advised that federal regulations require aggregate year-to-date totals to include only those contributions which are received during the calendar year. In the event that the aggregate year-to-date total is correct, please note that federal regulations also require the disclosure of all contributions received from individuals who have contributed over \$200. 11 CFR §104.3(a)(4) Please amend your report to provide the correct aggregate year-to-date totals.

-Schedule A of your 2004 12 Day Pre-General, 30 Day Post-General and Year End Reports combined, discloses receipts totaling \$453,957.51 from the "Northern Ohio Victory Committee," which is a joint fundraising committee affiliated with your committee. The sum of the entries itemized on the memo Schedule A, however, total only \$77,000.00.

Please be advised that a memo Schedule A must be provided to itemize your committee's share of the gross contributions received through the joint fundraiser. The memo schedule should itemize each individual who has contributed an aggregate in excess of \$200 during the calendar year, and

25038821210

provide the amount of unitemized contributions received. In addition, the memo schedule should itemize your committee's share of all contributions from political committees, regardless of amount. 11 CFR §102.17(c)(8)(i)(B) Please clarify this discrepancy.

-Schedule A supporting Line 15 of your report discloses \$5,750.00 from the "EMPOWER MEDIA MARKETING" and "INTERNATIONAL STRATEGIC PTNRS" for offsets to operating expenditures; however, your report(s) does not appear to disclose a disbursement(s) to this entity. Please provide clarifying information regarding this activity and amend your report(s) if necessary.

-Itemized disbursements must include a brief statement or description of why the disbursements were made. Please amend Schedule B of your report to clarify the following description(s): "CONTRACT LABOR," "FREIGHT," "PRODUCTION COST" and "PRODUCTION SERVICES." For further guidance regarding acceptable purposes of disbursements, please refer to 11 CFR §104.3(b)(3).

-Schedule B supporting Line 22 of your report discloses transfers to "2004 Joint State Victory Committee" which appears to be a joint fundraising committee. For further guidance on the question of joint fundraising, please refer to 11 CFR §102.17. If your committee is involved in joint fundraising with "2004 Joint State Victory Committee" you should amend your Statement of Organization to reflect this joint fundraising relationship on Line 6.

-Schedule E, supporting Line 24 of your report, discloses several independent expenditures on behalf of "GEORGE W BUSH" which appear to have been distributed or publicly disseminated after the general election date. Please be advised that if the communication is aired in one reporting period and the payment is made in a later reporting period, the independent expenditure should be reported as a memo entry on Schedule E when the communication is publicly disseminated and on a Schedule D if it is a reportable debt under 11 CFR §104.11. When the payment for the independent expenditure is made, the report should show a payment on Schedule E and the same payment on Schedule D, if applicable.

Please amend your report to provide further clarifying information regarding the independent expenditures disclosed after the general election date.

2503821211

-Schedule F, supporting Line 25 of your report, discloses several coordinated expenditures on behalf of "GEORGE W BUSH" which appear

to have been distributed or publicly disseminated after the general election date. Please be advised that if the communication is aired in one reporting period and the payment is made in a later reporting period, the coordinated expenditure should be reported as a memo entry on Schedule F when the communication is publicly disseminated and on a Schedule D if it is a reportable debt under 11 CFR §104.11. When the payment for the coordinated expenditure is made, the report should show a payment on Schedule F and the same payment on Schedule D, if applicable.

Please amend your report to provide further clarifying information regarding the coordinated expenditures disclosed after the general election date.

**Unlike previous election cycles, you will not receive an additional notice from the Commission on this matter. Adequate responses received on or before this date will be taken into consideration in determining whether audit action will be initiated. Requests for extensions of time in which to respond will not be considered. Failure to provide an adequate response by this date may result in an audit of the committee. Failure to comply with the provisions of the Act may also result in an enforcement action against the committee. Any response submitted by your committee will be placed on the public record and will be considered by the Commission prior to taking enforcement action.**

Electronic filers must file amendments (to include statements, designations and reports) in an electronic format and must submit an amended report in its entirety, rather than just those portions of the report that are being amended. If you should have any questions regarding this matter or wish to verify the adequacy of your response, please contact me on our toll-free number (800) 424-9530 (at the prompt press 5 to reach the Reports Analysis Division) or my local number (202) 694-1141.

Sincerely,



Kristine Adams

Campaign Finance Analyst

Reports Analysis Division

25038821212

25038821213